



CANADA: Protection of Persons with Disabilities, Human Trafficking, Freedom of Religion

Stakeholders' Report Submitted to the Human Rights Council's Universal Periodic Review Working Group, for the 44th Session of the UPR

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Submission by:

The Evangelical Fellowship of Canada (EFC) is the national association of evangelical Christian denominations, churches, post-secondary institutions and organizations in Canada. Established in 1964, the EFC provides a forum for collaboration and engagement among the roughly 1.7 million evangelicals who are part of its constituency.

The World Evangelical Alliance (WEA) is a network of churches in over 140 nations that have each formed an evangelical alliance and over 100 international organizations joining together to give a world-wide identity, voice, and platform to more than 600 million evangelical Christians worldwide.

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1. The following UPR stakeholders report provides information and recommendations to the government of Canada on (1) the right to life, protection of persons with disabilities and Medical Assistance in Dying, on (2) protection of women and girls from sexual exploitation, prostitution and human trafficking, on (3) protection of children from pornography, and (4) freedom of religion and non-discrimination on the basis of religion.

Persons with Disabilities and Medical Assistance in Dying

2. The Supreme Court of Canada, in the *Carter* decision (2014), allowed exemptions to the blanket ban on euthanasia and assisted suicide. The Court ruled that an adult with a grievous and irremediable medical condition, whose suffering was intolerable, could request physician-assisted suicide. The Court accepted the trial judge's assessment of the need for "stringent limits that are scrupulously monitored and enforced."ⁱ (at par 105)
3. In 2016, the Canadian federal government passed former Bill C-14, to allow euthanasia and assisted suicide, known as Medical Assistance in Dying (MAiD). Competent adults with a grievous and irremediable medical condition, who made a voluntary request with informed consent were eligible for hastened death. One of the initial safeguards in the law was that hastened death was limited to patients whose "natural death has become reasonably foreseeable," a vague definition that was not given clear parameters and is subject to interpretation by assessors.
4. An open letter to parliamentarians by national disability groups in 2016 spoke about the need for robust safeguards in the law to protect vulnerable persons. ⁱⁱ The letter noted far too many Canadians are vulnerable and struggle to access basic supports and services, particularly Canadians with disabilities, and pointed to the threat of being pressured to obtain physician-assisted dying.
5. Referring to the 2016 legislation, the UN Committee on the Rights of Persons with Disabilities specifically recommended that Canada "ensure persons who seek an assisted death have access to alternative courses of action and to a dignified life made possible with appropriate palliative care, disability support, home care and other social measures that support human flourishing."ⁱⁱⁱ However, the legislation merely required that patients be *informed of* the means available to relieve their suffering. To inform of treatment is very different from ensuring a person has access to treatment or that a person receives the benefit of treatment. This does not take into consideration lengthy waiting lists for some treatments and supports, or that they are not uniformly available across the country. The requirements of the legislation do not substantively address a person's lack of social support or the limited availability of palliative care, treatment or mental health care. It is wholly inadequate as a safeguard and falls far short of *ensuring*

access to care and other options.

6. After a visit to Canada in 2019, the former Special Rapporteur on the rights of persons with disabilities expressed extreme concern about the impact of Canada's 2016 legislation on medical assistance in dying from a disability perspective.^{iv} She asked the Canadian government to investigate complaints related to medical assistance in dying and to put adequate safeguards in place to ensure that people with disabilities don't request medical assistance in dying because of the absence of community-based alternatives and palliative care. We believe these concerns and actions are still relevant today.
7. In the 2019 *Truchon* decision, a Quebec lower court declared it unconstitutional to limit eligibility for MAiD to those whose natural death was reasonably foreseeable. The federal government did not appeal this decision to a higher court, which would have been the expected response to a lower court decision making a significant amendment to the *Criminal Code*.
8. Rather, the federal government introduced Bill C-7, which passed in 2021. Bill C-7 created a second track for medical assistance in dying, making those who were not dying but who have a disability or chronic illness eligible for hastened death.
9. Every major disability rights organization in Canada opposed Bill C-7. Many witnesses before parliamentary committees described its impact on Canadians with disabilities, for example, "Physicians report that patients with disabilities are requesting MAiD upon learning that the wait time for accessible housing with the supports they require is 10 years or more."^v Another witness from a national disability rights organization stated, "Bill C-7 is our worst nightmare"^{vi} A leading disability rights activist asked the committee, "Will you rise to the defence of human rights?"^{vii}
10. An open letter to members of Parliament opposing Bill C-7 was signed by more than 100 disability groups. They called the bill dangerous and discriminatory and stated, "Bill C-7 sets apart people with disabilities and disabling conditions as the *only* Canadians to be offered assistance in dying when they are not actually nearing death."^{viii}
11. Three UN human rights experts expressed deep concern over the expansion of MAiD to persons with disabilities who are not close to death, that the eligibility criteria set out in Bill C-7 may be "of a discriminatory nature, or have a discriminatory impact, as by singling out the suffering associated with disability as being of a different quality and kind than any other suffering...."^{ix} They pointed to the need for extensive conversations with organizations representing persons with disabilities and said that those most directly affected by ableist assumptions must be heard and heeded. They asked Canada to indicate the measures it has taken to consult with organizations representing persons with disabilities and older persons.

12. In the Joint Communication, the three experts also questioned how offering medical assistance in dying to persons with disabilities who are not close to death could be compatible with Articles 5 and 8 of the CRPD. They expressed concern that the legislation would result in “a two-tiered system in which some would get suicide prevention and others suicide assistance, based on their disability status and specific vulnerabilities.”^x
13. We agree that this legislation poses a real and significant threat to the lives of persons with disabilities, as the experts stated: “We believe that in the current climate where there are some questions about the relative lack of access to palliative care and social support means that free choice may not exist, the threat to the lives of persons with disabilities posed by such legislation is real and significant.”^{xi}
14. The Special Joint Committee on Medical Assistance in Dying has heard from many witnesses on the impact of the law on people with disabilities, such as requests for hastened death because of a lack of resources, housing, or support. As a representative of the ARCH Disability Law Centre testified, “At ARCH we have clients who have died by MAID, who have applied for MAID or who are contemplating MAID. This is not because they want to die; it's because they cannot get the housing, medical care, disability services or supports they need, and they are too poor to afford to purchase these services privately.”^{xii}
15. A representative from Inclusion Canada told the parliamentary committee, “Not a single national organization of persons with disabilities supported the expansion of MAID, and over 200 independent, non-affiliated organizations representing persons with disabilities actively opposed the expansion.”^{xiii} Dr. Heidi Janz, adjunct professor in disability studies, described the medical assistance in dying regime to the committee as “eugenics disguised as autonomy” and asked policymakers to stop the injustice.^{xiv}
16. The parliamentary committee issued its report in February 2023 and has recommended the government amend the assisted dying legislation to make minors with decision-making capacity eligible for hastened death.^{xv} The report recommends eligibility be limited to mature minors whose natural death is reasonably foreseeable. It states that parents should be consulted, where appropriate, but that the will of the minor takes priority. The committee also recommends allowing advance requests for MAID following a diagnosis of a serious and incurable medical condition or a disorder leading to incapacity. This would mean a patient would not need to consent or be capable of consent at the time their life is ended.
17. Canada’s health care systems have been described by the Prime Minister himself as “strained, if not broken right across the country in many, many ways.”^{xvi} Confidence is being placed in the adequacy of the health care system to screen, to protect and to safeguard people. However, it should be the function of the legislation to ensure minimum standards of protection and adequate safeguards, not individual medical

practitioners in a healthcare system that is in crisis.

18. Many Canadians are very concerned about the planned expansion to allow hastened death for persons whose only underlying medical condition is mental illness. This significant change was added to Bill C-7 in its final stages and did not receive robust study at Committee or debate in Parliament. Rather than making this change after it had been determined that Canadian society and the healthcare system were ready, this expansion was added by way of a sunset clause, to take effect two years after the bill was passed. This expansion is particularly concerning in the context of a strained healthcare system. The government has tabled legislation to delay the timing of the expansion for one year, but a mere delay is insufficient.
19. Some MAID practitioners have withdrawn from carrying out the hastened death of patients whose natural death is not reasonably foreseeable.^{xvii} Other medical practitioners say they feel intense pressure to participate in hastened death against their conscientious objection.^{xviii} There are likely to be increasing situations of medical practitioners who object to providing hastened death in principle or in specific situations. Canada must put in place robust, specific conscience protection for medical practitioners. This would also allow patients to choose a medical practitioner whose views on assisted dying align with their own, facilitating greater patient confidence and trust in their medical provider.
20. To protect persons from feeling pressured to request hastened death in moments of vulnerability and to avoid undue influence by medical professionals, it is essential that conversations about medical assistance in dying be patient-initiated. Medical practitioners must not be the ones to suggest hastened death as an option.
21. Canada had the highest rate of organ donation by medical assistance in dying patients among four nations studied that offer this practice. Canada accounted for almost half of the total number of organ transplants after euthanasia in all four jurisdictions.^{xix} The high rate of organ donation after euthanasia is particularly disturbing given that the loss of ability to engage in meaningful activities and feelings of being a burden are commonly identified as the source of the suffering leading Canadians to request medical assistance in dying.^{xx} There is a risk that the option of organ donation may push these patients toward requesting hastened death, in order to look for meaning in their life and death in their vulnerable moments.

Recommendations

22. **Repeal medical assistance in dying provisions which make hastened death available to people with disabilities whose natural death is not reasonably foreseeable.**
23. **Halt the expansion of medical assistance in dying to persons with mental illness as their only medical condition.**

24. **Investigate accounts of people requesting medical assistance in dying in the absence of housing, treatment or support, and take steps to ensure these adequate supports and resources are provided.**

Sexual Exploitation

25. The exploitation of women and girls in the commercial sex industry is a form of systemic violence against women. It is a significant abuse of human rights and a systemic exploitation of many of our society's most vulnerable women and children.
26. Sex trafficking, prostitution and pornography are inextricably linked. None of these exists in isolation from the others. Pornography fuels the demand for paid sex, which funnels women into prostitution and fuels sex trafficking.
27. Sexual exploitation in Canada is a deeply gendered problem, with the overwhelming majority of sex-trafficked and sexually exploited persons being women and girls.^{xxi} The Report of the National Task Force on Sex Trafficking of in Canada found that "sex trafficking is a serious threat to women's equality and the basic right of every woman and girl to live free from violence."
28. Article 9.5 of the *Palermo Protocol*, which Canada ratified in 2002, obligates signatory countries to address factors that make individuals vulnerable to sex trafficking, such as poverty and lack of opportunity, as well as to adopt or strengthen legislative or other measures to discourage the demand that fosters all forms of exploitation.^{xxii}

Prostitution

29. Prostitution violates human dignity and is an affront to equality between the sexes. It is grounded in the belief that men are entitled to paid sexual access to the bodies of women and children.
30. Prostitution is not merely a series of interactions between purchaser and purchased that exist independently of one another. It is part of a system of exploitation that is based on structural inequalities and preys on vulnerabilities. The system of prostitution is inherently violent, dangerous and exploitive. Prostitution cannot be considered safe or legitimated as a form of work; nor can it be accepted as a solution to poverty and a range of other underlying social issues.
31. In 2016, Canada enacted the *Protection of Communities and Exploited Persons Act (PCEPA)*, which targets those who profit financially and materially from the prostitution of others and criminalizes the purchase of sexual services. This legislation treats prostitution as a form of sexual exploitation that disproportionately and negatively impacts on women and girls. It recognizes the systemic nature of prostitution and

maintains that “the best way to avoid prostitution’s harms is to bring an end to its practice.”^{xxiii} The purchasing prohibition is the lynchpin of the prostitution laws and takes aim at the root of sexual exploitation in Canada. Decreasing the demand for paid sex is a crucial element of any efforts at eliminating sexual exploitation.

32. Since the laws were enacted Statistics Canada reports a significant decrease in the proportion of women accused in sex trade-related incidents: from 42% in 2010 to 22% in 2014 and 5% by 2019. It also reports a significant decrease in homicide victims related to the sex trade, despite overall homicides increasing.^{xxiv} Furthermore, perpetrators were less likely to be sex buyers or gang members after the laws were enacted, and more likely to be strangers or acquaintances.^{xxv} Fewer victims in sex-trade related offences have reported physical injuries since the legislation put in place.
33. In June 2022, the House of Commons Standing Committee on Justice and Human Rights tabled its review of the prostitution laws. While the report recommends extensive consultation take place prior to any amendment, the underlying premise of the report is deeply troubling – namely that Canada should move toward decriminalization and that the prostitution provisions themselves cause harm to those in prostitution.^{xxvi} The provisions prohibiting the purchase of sexual services, procuring and profiting from the sale of another person’s sexual services play a critical role in protecting women’s rights and combating sexual exploitation, and must be upheld. Canada must not move toward decriminalization.
34. The Committee noted that enforcement of the prostitution laws has been inconsistent across Canada and recommended the government study how more consistent application across the country could be encouraged. Proper assessment of the efficacy of the provisions, and amendments to improve them, also depend on effective enforcement. The Attorney General of Canada should instruct provincial counterparts to ensure that the prostitution laws are enforced.
35. The *Protection of Communities and Exploited Persons Act* was crafted after a Nordic or Equality Model of law and policy on prostitution, which has three key elements: (i) criminalization of sex buying and pimping, (ii) significant, long-term investment in exit supports and services, and (iii) public awareness and education campaigns. These three elements are intended to work together, but Canada must take steps to fully implement this approach by increasing funding for exit supports and services and by carrying out public awareness and education campaigns.
36. In the 2022 *R. v. N.S.* decision, the Ontario Court of Appeal upheld the constitutionality of several provisions of the *Protection of Communities and Exploited Persons Act*. Justice Hoy noted that Parliament has fundamentally changed the lens through which it views prostitution. “Rather than viewing prostitution as a nuisance, it views prostitution as inherently exploitative and something that must be denounced and discouraged.”^{xxvii} [paragraph 55] The decision confirmed that sex workers are permitted to work

cooperatively with others selling their own sexual services, and may obtain, for example, security services on a shared, cooperative basis.^{xxviii}

37. In the fall of 2022, the Ontario Superior Court heard a challenge of all the provisions of the *Protection of Communities and Exploited Persons Act* as they relate to adults. As an intervenor, the EFC argued that in passing the prostitution laws, Parliament determined that the purchase of sexual services is exploitative and sought to protect the dignity and equality of vulnerable populations who are disproportionately impacted by prostitution. We commend the government for defending the legislation and its objective to “reduce the demand for prostitution with a view to discourage entry into it, deterring participation in it and ultimately abolishing to the greatest extent possible, in order to protect communities, human dignity and equality.”^{xxix} We encourage the government to continue to defend the legislation and to appeal if the lower courts strike down key provisions in their decisions.
38. The *UN Convention for the Elimination of All Forms of Discrimination Against Women* and the *Palermo Protocol* require that signatories address underlying vulnerabilities such as poverty and lack of opportunity. Substantive and sustained investment in exit support services is needed.

Recommendations

39. **Uphold and defend the prostitution laws, which aim to reduce the demand for sexual services, and encourage their enforcement in all jurisdictions.**
40. **Prioritize consultation with survivors of exploitation regarding any future changes to the prostitution legislation and maintain a victim-oriented approach to addressing sexual exploitation.**
41. **Provide stable, substantive funding for exit services and supports for those who wish to exit prostitution.**

Human Trafficking

42. The *UN Convention for the Elimination of All Forms of Discrimination Against Women* requires signatories to “take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women.”^{xxx} Canada ratified this treaty in December 1981.
43. Since ratifying the UN’s *Palermo Protocol* in 2002, Canada has passed criminal laws relating to sex trafficking in both the *Immigration and Refugee Protection Act* (2002) and the *Criminal Code* (2005, 2010, 2011). The Canadian government has shown strong

leadership in combatting human trafficking by passing and strengthening legislation and introducing the National Action Plan to Combat Human Trafficking (2012-2016)^{xxxvi}, and National Strategy to Combat Human Trafficking (2019-2024).^{xxxvii} Canada should implement a permanent strategy, with permanent ongoing funding and a method of collecting standardized, reliable, national, multi-year data to inform solutions and measure results.

44. Despite this leadership, recent amendments to the *Criminal Code* have weakened the penalties for certain trafficking-related offences. Former Bill C-75,^{xxxviii} which became law in 2019, hybridized offences related to receiving a material benefit from trafficking and withholding or destroying documents. This change allowed these offences to be treated as relatively minor summary offences at the discretion of prosecutors. More recently, Bill C-5^{xxxix} allowed conditional sentencing, or house arrest, for the offence of trafficking of persons for material benefit. The categorization of a criminal offence tends to indicate the degree of seriousness of the conduct covered by the offence. It is important that the gravity of these offences, which constitute a significant violation of human rights, be consistently reflected in our laws and policies. Human trafficking can be a low-risk, high-reward endeavour for traffickers. Canada must maintain and implement more serious consequences for traffickers, rather than reducing or minimizing risk for traffickers even further.
45. Recent data released by Statistics Canada reveal that prosecution of human trafficking offences remains a challenge. From 2011 to 2021, less than half of detected incidents of human trafficking resulted in the laying or recommendation of charges.^{xxxv} In that decade, just 12% of human trafficking cases completed in adult criminal court resulted in a guilty verdict for a human trafficking charge. Very few perpetrators are convicted of human trafficking offences.
46. The same data shows that it continues to be mainly Canadian women and girls being trafficked domestically, and they are being trafficked into the commercial sex trade. Traffickers continue to be predominantly male.^{xxxvi}
47. Indigenous women and girls are highly over-represented among victims of sexual exploitation and are uniquely vulnerable to exploitation due to the lasting effects of colonization and the residential school system.

If there were no demand for paid sex, traffickers would not procure women and girls for sex trafficking. Decreasing the demand for paid sex, then, is a crucial element of any efforts at eliminating sexual exploitation. Several UN instruments obligate countries to address, reduce or eliminate demand.^{xxxvii} The OSCE's paper "Discouraging the demand that fosters trafficking for the purpose of sexual exploitation"^{xxxviii} highlights the importance of addressing the demand that fosters trafficking for sexual exploitation, in particular the exploitation of the prostitution of others.

Recommendations

48. **Ensure human trafficking penalties reflect the severity of the crime.**
49. **Implement a permanent national strategy to combat human trafficking, with increased and stable funding for victim services, training of law enforcement and other frontline personnel, and a method for central data collection.**
50. **Uphold the prohibition against buying sexual services as a critical tool in curbing the demand for paid sexual services, which is known to fuel sex trafficking.**

Pornography

51. Pornography is a form of commercial sexual exploitation, and the root of many other forms of sexual exploitation. Mainstream pornography is characterized by violence and the degradation and humiliation of women. The themes in pornography, either dominant or implied, undermine the safety of women and girls and their rights to full equality.
52. There is a growing body of evidence about how exposure to pornography is harming the psychosocial and sexual development and health of children and youth. Pornography use by minors has been linked to earlier and riskier sexual activity, increased acceptance of sexual violence in relationships, and compulsive behaviour. There is also increasing incidence of child-on-child sexual abuse related to consumption of pornography. The younger the age of exposure, the greater the impact on minors. Canada must investigate and initiate concrete actions to protect children from exposure to online pornography.
53. Children and teens are viewing pornography at increasingly younger ages. Youth are easily able to access free sites that do not have any meaningful age verification in place, like Pornhub. The government should pass legislation to require commercial pornography sites to put in place meaningful third-party, privacy-compliant age verification to ensure users are adults.
54. Pornography has been called the public health crisis of the digital age.^{xxxix} Canada should support and commission research on the society-wide public health impacts of pornography.
55. In 2021, the House of Commons Standing Committee on Access to Information, Privacy and Ethics studied the protection of privacy and reputation on platforms such as Pornhub. The Ethics Committee heard from survivors who shared the devastating impact pornography platforms have had on their lives. Witnesses found their images

were posted without their knowledge or consent and fought a difficult battle to have them removed. In its report, the Committee unanimously recommended the government explore ways to hold commercial pornography sites accountable for hosting content such as child sexual abuse material and intimate images shared without consent.^{xi}

56. Children and youth face devastating, lifelong consequences when videos and images of their abuse and exploitation are streamed and distributed. As recommended by the Ethics Committee, Canada must introduce legislation to mandate that pornography platforms verify the age and consent of every person depicted in an image or video uploaded to their site, before it is posted.^{xii}
57. Platforms must be held responsible to identify child sexual abuse material before it is uploaded, and to immediately remove any child sexual abuse material identified. Similarly, platforms must be held responsible for ensuring they are not part of the non-consensual distribution of intimate images. The onus must not be on victims to search for their images online and to request platforms remove them.

Recommendations

58. **Mandate meaningful age verification that requires pornography platforms to ensure that only adults can access the content.**
59. **Require pornography platforms to verify the age and consent of persons depicted before uploading intimate images or video and hold platforms accountable to detect and immediately remove child sexual abuse material and non-consensual uploads.**

Freedom of Religion

60. There is a growing anti-religious climate in Canada that includes a belief that religion should be privatized and kept out of the public square. Anti-religious sentiment, misinformation and misunderstanding are leading to a growing sense of marginalization and discrimination.
61. There are reports of increased anti-religious incidents across Canada. Statistics Canada reports that police-reported hate crimes have increased 72% over the last two years, with a 67% increase in hate crimes targeting religion over the last year.^{xiii} An attack in 2020 targeted a Muslim family in London, Ontario, resulting in four deaths. There have been reports of a disturbing increase in antisemitic incidents in schools^{xiiii} and other settings.^{xliv}
62. People of deep religious convictions are facing possible exclusion from certain professions. A provincial law banning the wearing of religious symbols by people

working in certain civil service occupations, Quebec's Bill 21, was passed in 2019. The bill particularly impacts religious minority groups in the province and prevents them from working in positions of authority, such as teaching and policing, if they wear religious symbols.

63. Many Evangelicals feel the anti-religious sentiment and underlying discrimination. Evangelicals are more likely to be affected by government policies that relate to belief or expression, than policies on the wearing of religious symbols.
64. The College of Physicians and Surgeons of Ontario (CPSO) has policies which require doctors to participate in the ending of a patient's life by providing an effective referral, even against their deeply held beliefs. Doctors who are conscientious objectors will be forced to choose between violating their conscience and facing professional discipline.
65. The first guarantee in Canada's *Charter of Rights and Freedoms* is the freedom of conscience and religion. Canada can protect these crucial freedoms by enacting a *Criminal Code* provision that makes it an offence to coerce an individual to act against their deeply-held convictions. Especially in the current context of a healthcare system in crisis, protecting medical practitioners from moral injury and distress may help to maintain their participation in the healthcare system.
66. The federal government has indicated plans to make "anti-abortion organizations that provide dishonest counselling to pregnant women about their rights and options" ineligible for charitable status.^{xlv} All charities should carry out their activities honestly and ethically, with integrity. However, the EFC is concerned that these measures are only directed at organizations with a particular view on abortion. It raises the concern that participation in the public square and a level playing field with respect to government programs could be subject to a values test. Canada must follow the principles of procedural fairness and consistency in any policy changes. We ask that Canada be careful not to politicize the charitable sector by requiring charities to align with the policies of the government.
67. In 2021 the federal government passed Bill C-4, a law banning conversion therapy. Coercive and abusive efforts to change a person's sexual orientation or gender identity have no place in our communities. However, the EFC is concerned that the definition of conversion therapy lacks clarity and risks capturing religious belief, teaching and practice on matters of sexuality. We are not aware of charges laid under the conversion therapy provisions, but we remain concerned about the possibility the law could be interpreted and applied in a way that is overbroad and violates religious freedom.
68. Canada's religious and cultural diversity means there will necessarily be times when Canadians disagree with one another. Prohibiting the expression of dissenting ideas is not the solution. Upholding freedom of expression means allowing differences and the contrary opinions of others to be expressed. Requiring affirmation or celebration of a practice or belief with which one disagrees violates the freedoms of conscience, religion, thought, belief, opinion and expression. The solution to difference and dissent is not the marginalization or pressured privatization of faith. The government should demonstrate recognition and respect for religious beliefs, practices and traditions. Organized religions in Canadian society form an integral part of the lives of Canadian citizens and contribute

to the public good.

69. Religious freedom is exercised publicly as well as privately. When a religious freedom concern is raised in response to a planned government action or in a dispute with government agencies, the courts and government decision makers have a responsibility to consider the claim.

Recommendations

70. The Canadian government should protect the right to conscientious objection for healthcare providers who refuse to participate in Medical Assistance in Dying.

71. Ensure that no person or organization shall be deprived of any benefit, or be subject to any obligation or sanction, solely by reason of their exercise of freedom of conscience and religion guaranteed under the Canada's Charter of Rights and Freedoms.

ⁱ <https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/14637/index.do>

ⁱⁱ <https://static1.squarespace.com/static/56bb84cb01dbae77f988b71a/t/57603e714c2f859a20472fb5/1465925235046/-+30+-+Press+Release+-+Open+Letter+to+Parliamentarians+-+May+31+-+FINAL.pdf>

ⁱⁱⁱ *Concluding observations on the initial report of Canada*, paragraph 24(a) by the Committee on the Rights of Persons with Disabilities, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/112/49/PDF/G1711249.pdf?OpenElement>

^{iv} *End of Mission Statement* by the UN Rapporteur on the rights of persons with disabilities, April 12, 2019, <https://www.ohchr.org/en/statements/2019/04/end-mission-statement-united-nations-special-rapporteur-rights-persons?LangID=E&NewsID=24481>

^v Dr. Heidi Janz, <https://www.ourcommons.ca/DocumentViewer/en/43-2/JUST/meeting-6/evidence#Int-11001682>

^{vi} Krista Carr, Inclusion Canada, <https://www.ourcommons.ca/DocumentViewer/en/43-2/JUST/meeting-6/evidence#Int-11001549>

^{vii} Dr. Catherine Frazee, <https://www.ourcommons.ca/DocumentViewer/en/43-2/JUST/meeting-6/evidence#Int-11001675>

^{viii} <http://www.vps-npv.ca/stopc7>

^{ix} OL CAN 2/2021, Joint Communication by the Special Rapporteur on the rights of persons with disabilities, the Independent Expert on the enjoyment of human rights by older persons, and the Special Rapporteur on extreme poverty and human rights, February 3, 2021,

<https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=26002>

^x <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=26002>

^{xi} <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=26002>

^{xii} <https://parl.ca/DocumentViewer/en/44-1/AMAD/meeting-27/evidence#Int-11927653>

^{xiii} <https://parl.ca/DocumentViewer/en/44-1/AMAD/meeting-27/evidence#Int-11927370>

^{xiv} <https://parl.ca/DocumentViewer/en/44-1/AMAD/meeting-28/evidence#Int-11939915>

^{xv} <https://www.parl.ca/Content/Committee/441/AMAD/Reports/RP12234766/amadrp02/amadrp02-e.pdf>

^{xvi} <https://www.ctvnews.ca/politics/trudeau-on-tough-economic-headwinds-unapologetic-for-tinfoil-hat-rhetoric-1.6204307>

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- xvii <https://parl.ca/DocumentViewer/en/44-1/AMAD/meeting-3/evidence#Int-11633409>
- xviii <https://collectifmedecins.org/en/press-release-2/>
- xix J. Mulder, H. Sonneveld, D. Van Raemdonck, J. Downar, K. Wiebe, B. Dominguez-Gil, A. Healey, B. Desschans, A. Neyrinck, A. Pérez Blanco, I. van Dusseldorp and G. Olthuis, “Practice and challenges for organ donation after medical assistance in dying,” *American Journal of Transplantation*, Sept 13, 2022, <https://onlinelibrary.wiley.com/doi/10.1111/ajt.17198>
- xx <https://www.canada.ca/en/health-canada/services/medical-assistance-dying/annual-report-2021.html#a4.3>
- xxi <https://www150.statcan.gc.ca/n1/daily-quotidien/221206/dq221206c-eng.htm?CMP=mstatcan>
- xxii <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>
- xxiii <https://www.justice.gc.ca/eng/rp-pr/other-autre/protect/p1.html>
- xxiv “Crimes related to the sex trade: Before and after legislative changes,” Statistics Canada, June 21, 2021, <https://www150.statcan.gc.ca/n1/pub/85-002-x/2021001/article/00010-eng.htm#r11>
- xxv <https://www150.statcan.gc.ca/n1/pub/85-002-x/2021001/article/00010-eng.htm#r11>
- xxvi <https://www.ourcommons.ca/Content/Committee/441/JUST/Reports/RP11891316/justrp04/justrp04-e.pdf>, see recommendations #7 and #4
- xxvii <https://www.ontariocourts.ca/decisions/2022/2022ONCA0160.htm>
- xxviii Decision of the Ontario Court of Appeal in *R v. N.S.*, at par. 93, <https://www.ontariocourts.ca/decisions/2022/2022ONCA0160.htm>
- xxix Factum of the Respondent, *AG of Canada in CASWLR v. Attorney of Canada and Attorney General of Ontario*, at par. 20 (a).
- xxx <https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx> , Article 6
- xxxi <https://www.publicsafety.gc.ca/cnt/rsres/pblctns/ntnl-ctn-pln-cmbt/ntnl-ctn-pln-cmbt-eng.pdf>
- xxxii <https://www.publicsafety.gc.ca/cnt/rsres/pblctns/2019-ntnl-strtg-hmnn-trffc/index-en.aspx>
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